

United States District Court

AUG 29 2016

SOUTHERN

DISTRICT OF

TEXAS David J. Bradley, Clerk

UNITED STATES OF AMERICA

McAllen Division

V.

CRIMINAL COMPLAINT

Sofia OLIVEROS

Case Number: M-16-1579-M

YOB: 1985

COC: United States

Name and Address of Defendant

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about August 27, 2016 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)  
I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

Refer to Attachment A

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No

Sworn to before me and subscribed in my presence,

Approved By: T. Trevino

August 29, 2016

9:20 am

at

Date

Peter E. Ormsby

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Complainant

Juan R. Ciénega

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

### **Attachment A**

On August 27, 2016, the defendant attempted to bring illegally into the United States through the Progreso Port of Entry an alien child J.L.C.G. (male, 14 years old), a Mexican citizen, as a United States citizen. At pedestrian primary, the defendant stated J.L.C.G. was a United States citizen and presented a City of Corpus Christi, Texas birth certificate bearing the name J.C.F.G. as proof. When asked about their relationship, she claimed the child as her nephew. Both were referred to secondary for further inspection.

In secondary, further inspection revealed the true identity and place of birth of the minor. When confronted with this information, the defendant admitted to knowing the child was not a United States citizen, and to knowing he was born in Mexico. She went on to state she had made prior arrangements with the child's aunt, to bring the child into the United States illegally using her friend's son's birth certificate.

Furthermore, earlier in the day she had arrived from Corpus Christi and traveled to Nuevo Progreso, Tamaulipas, Mexico, where she took custody of the minor from his grandmother near the international bridge. For her services, the defendant had been provided with \$300 dollars to cover expenses to Corpus Christi.

Contact was established with the child's grandmother and she arrived at the port to claim her grandson. Both were returned to Mexico without further incidents.